

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FCS ADVISORS, LLC,

Plaintiff,

-against-

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS A,
INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Matthew L. Schwartz, the Declaration of Thomas (Mitch) Dockens, the Declaration of Michael Fuqua, as Receiver, and the exhibits attached thereto, and for the reasons stated in the Memorandum of Law submitted herewith, CogniSphere, LLC (“CogniSphere”), by and through its attorneys, Boies Schiller Flexner LLP, hereby moves this Court before the Honorable P. Kevin Castel, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 11D, for an Order compelling Basler Turbo Conversions, L.L.C. (“Basler”) to come into compliance with the Court’s June 11, 2024 Order and reimburse CogniSphere for the damages caused by Basler’s noncompliance, and granting such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s October 9, 2024 Order, opposition papers shall be served and filed on or before November 8, 2024, and reply papers shall be served and filed on or before November 15, 2024.

Dated: October 25, 2024
New York, New York

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Matthew L. Schwartz

Matthew L. Schwartz

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Attorneys for CogniSphere, LLC